

1 JEROME C. ROTH (State Bar No. 159483)
jerome.rott@mto.com

2 HOJOON HWANG (State Bar No. 184950)
hojoon.hwang@mto.com

3 MIRIAM KIM (State Bar No. 238230)
miriam.kim@mto.com

4 MUNGER, TOLLES & OLSON LLP
560 Mission Street
5 Twenty-Seventh Floor
San Francisco, California 94105-2907
6 Telephone: (415) 512-4000
Facsimile: (415) 512-4077

7 WILLIAM D. TEMKO (State Bar No. 98858)

8 william.temko@mto.com
MUNGER, TOLLES & OLSON LLP

9 355 S. Grand Avenue
Thirty-Fifth Floor
10 Los Angeles, California 90071-1560
Telephone: (213) 683-9100
11 Facsimile: (213) 687-3702

12 *Attorneys for Defendant LG Electronics, Inc.*

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15
16 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

17
18 This Document Relates to:

19 DIRECT PURCHASER ACTIONS

**DECLARATION OF DUK CHUL RYU IN
SUPPORT OF LG ELECTRONICS, INC.'S
REPLY IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS**

Judge: Honorable Samuel Conti

Date: February 6, 2015

Time: 10:00 am

Crtrm: 1, 17th Floor

20
21
22
23
24
25 I, Duk Chul Ryu, hereby declare:

26 1. I am currently employed by LG Electronics, Inc. ("LGE") as a general manager for
27 LGE's Procurement Development Management Team. I have personal knowledge of the facts and
28

1 matters stated herein and, if called, could and would testify competently to them. Although
2 English is not my native language, I fully understand the contents of this Declaration.

3 2. From 2003 through 2005, I was a manager at LGE, in charge of color display tube
4 ("CDT") procurement for LGE's monitor manufacturing. In 2005, I was promoted to general
5 manager and began to handle color picture tube ("CPT") procurement for LGE's television
6 manufacturing in addition to CDT procurement. I held this position through 2010. My
7 procurement responsibilities were worldwide and were not limited to a particular geographic
8 region. CDTs and CPTs are commonly referred to as cathode ray tubes or "CRTs."

9 3. After LG.Philips Displays ("LPD") was formed in 2001, LGE regularly purchased
10 CRTs from suppliers other than LPD. In 2003, Samsung SDI was one of the suppliers from whom
11 LGE purchased CRTs.

12 4. I have reviewed the procurement related documents attached as Exhibits 1-3 to this
13 declaration. Based on my personal knowledge of LGE's practices in preparing, receiving, or
14 maintaining such procurement records and the manner in which they are used in the business, I
15 declare that Exhibits 1-3 are true and correct copies of email chains that contain statements by
16 LGE employees that were recorded at or near the time of the recorded event, by – or from
17 information transmitted by – employees with knowledge of the contents or the event, in the
18 regular course of LGE's business.

19 5. Attached hereto as Exhibit 1 is a true and correct copy of an email chain, labeled
20 with Bates Number LGE00070864 and LGE00070864 E (Korean and Certified Translation
21 English versions), that I sent on January 25, 2005 with the subject title "FW: SDI CDT" during the
22 regular course of my business at LGE.

23 6. Attached hereto as Exhibit 2 is a true and correct copy of an email chain, labeled
24 with Bates Number LGE00080915 and LGE00080915 E (Korean and Certified Translation
25 English versions) that I sent on January 25, 2005 with the subject title "SDI CDT" during the
26 regular course of my business at LGE.

27 7. Attached hereto as Exhibit 3 is a true and correct copy of an email chain, labeled
28 with Bates Number LGE00085313 and LGE00085313 E (Korean and Certified Translation

1 English versions) that I sent to General Manager Seung Man Lee at LGE on January 31, 2005,
2 during the regular course of my business at LGE.

3 I declare under penalty of perjury under the laws of California that the foregoing is true
4 and correct. Executed on the 23 day of January, 2015 in Seoul.

5
6 
7 _____
8 DUK CHUL RYU
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28